

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-15-SLR
	:	
JOSEPH PRYER,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF SENTENCING DATE**

Defendant, Joseph Pryer, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order continuing the date for the sentencing hearing in this case. In support of the motion, the defense submits as follows:

1. Mr. Pryer is scheduled to be sentenced on November 28, 2005 at 4:30 p.m.
2. Defense counsel requires additional time to prepare for the sentencing hearing.
3. Defense counsel also requires additional time to make comments and objections to Mr. Pryer's presentence report in this case. Defense counsel received the initial copy of the presentence report on October 28, 2005. However, USPO Walter Matthews has informed counsel that he has not yet had the opportunity to speak with Mr. Pryer's family and that there is additional information that may be added to the presentence report after Mr. Matthews speaks with Mr. Pryer's family. Defense counsel would like the opportunity to have additional time to respond to any new information put in the presentence report.
4. Defense counsel respectfully requests that the sentencing be continued to allow her adequate time to respond to the presentence report and to prepare for the sentencing hearing.

5. AUSA Richard Andrews and USPO Walter Matthews do not oppose this request for a continuance.

6. All parties would request a date anytime after January 9, 2006.

WHEREFORE, it is respectfully requested that the Court continue Mr. Pryer's sentencing to anytime after January 9, 2006.

Respectfully Submitted,

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Joseph Pryer

DATED: November 15, 2005

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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v.	:	Criminal Action No. 05-15-SLR
	:	
JOSEPH PRYER,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that a copy of Defendant's Motion for Continuance of Sentencing Date is available for public viewing and downloading and was electronically delivered on November 15, 2005, to:

Richard Andrews, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

Undersigned counsel further certifies that on November 15, 2005, two (2) copies of the attached Motion for Continuance of Sentencing Date were hand delivered to a box designated for the U.S. Probation Office in the United States District Court of the District of Delaware addressed to the following person(s):

Walter Matthews  
U.S. Probation Officer  
Suite 400, 824 Market Street  
Wilmington, DE 19801-3588

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King St., Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Joseph Pryer